

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Elizabeth Coble, Milagros Harper, and Dennis
Harper, on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

Cohen & Slamowitz, LLP, David Cohen, Esq.,
Mitchell Slamowitz, Esq., Leandre John, Esq., and
Crystal S.A. Scott, Esq.,

Defendants.

Index: 11-cv-01037

Hon. Edgardo Ramos

Hon. George A. Yanthis

**DECLARATION OF SHENNAN KAVANAGH REGARDING REVISED
PRELIMINARY APPROVAL DOCUMENTS**

I, Shennan Kavanagh, hereby declare as follows:

1. I am a partner in the law firm Klein Kavanagh Costello, LLP (“KKC”) and one of Plaintiffs’ counsel in this action, having been admitted to this case on a *pro hac vice* basis. [Docket No. 62]. I make this Declaration of my personal knowledge, and if called to testify, I could testify competently to the matters stated herein.

2. On April 23, 2014, the Court held a telephonic conference regarding the parties’ Joint Motion for Preliminary Approval of Class Action Settlement (“Motion”). The Court ordered the parties to make certain revisions to several documents submitted in connection with the Motion. Minute Entry dated April 24, 2014.

3. In addition to the revisions ordered by the Court, the parties made non-substantive conforming revisions for language consistency and addressed certain typographical errors.

4. Based on the Court’s order, the parties submit the following revised

documents both in redline form so the Court may easily identify the revisions as well as in final clean form:

- a. A true and correct copy of the Revised Settlement Agreement in redline form is attached as Exhibit 1.
- b. A true and correct copy of the Revised Settlement Agreement in clean form is attached as Exhibit 2. (original form at Dkt. No. 63).
- c. A true and correct copy of the [Revised Proposed] Preliminary Approval Order in redline form is attached as Exhibit 3.
- d. A true and correct copy of the [Revised Proposed] Preliminary Approval Order in clean form is attached as Exhibit 4. (original form attached to the Settlement Agreement as Exhibit E (Dkt. No. 63-8)).
- e. A true and correct copy of the Revised form of Class Notice in redline form is attached as Exhibit 5.
- f. A true and correct copy of the Revised form of Class Notice in clean form is attached as Exhibit 6. (original form attached to the Settlement Agreement as Exhibit D-1 (Dkt. No. 63-6)).
- g. A true and correct copy of the Revised form of Subclass Notice in redline form is attached as Exhibit 7.
- h. A true and correct copy of the Revised form of Subclass Notice in clean form is attached as Exhibit 8. (original form attached to the Settlement Agreement as Exhibit D-2 (Dkt. No. 63-7)).
- i. A true and correct copy of the [Revised Proposed] Final Approval Order and Judgment in redline form is attached as Exhibit 9.

j. A true and correct copy of the [Revised Proposed] Final Approval Order and Judgment in clean form is attached as Exhibit 10. (original form attached to the Settlement Agreement as Exhibit B (Dkt. No. 63-3)).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, and was executed in Boston, Massachusetts on April 28, 2014.

/s/ Shennan Kavanagh
Shennan Kavanagh